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Attorneys for CP Management Corp, As management agent for Orland Towne Center, L.L.C.

UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF VIRGINIA RICHMOND DIVISION

)	
)	Chapter 11
)	
)	Case No. 08-35653-KRH
)	
)	Jointly Administered
)	-
)))))

MOTION FOR LEAVE TO APPEAR PRO HAC VICE

Jesse N. Silverman, Constantinos G. Panagopoulos, and Kirsten E. Keating (the "Movants"), members in good standing with the State Bar of the Commonwealth of Virginia and attorneys admitted to practice before the United States Bankruptcy Court for the Eastern District of Virginia, and attorneys with the law firm of BALLARD SPAHR ANDREWS & INGERSOLL, LLP, hereby respectfully move the Court pursuant to Local Rule 2090-1(E)(2) to enter an Order permitting Robert D. Tepper, attorney and member of the law firm of SHENCK ANNES BROOKMAN & TEPPER, LTD, 311 S. Wacker Drive, Suite 5125, Chicago, Illinois 60606, to appear *pro hac vice* before this

Court in the above-captioned cases on behalf of CP Management Corp, as management agent for Orland Towne Center, L.L.C. In support of this motion, movants state as follows:

- 1. Mr. Tepper is a member in good standing of the Bar of the State of Illinois. Mr. Tepper is also a member in good standing of the Bar of the United States District Court for the Northern District of Illinois. There are no disciplinary proceedings pending against Mr. Tepper.
- 2. Mr. Tepper understands that if he is admitted *pro hac vice* in this case, he will be subject to the disciplinary jurisdiction of this Court.
- 3. Movants request the Court allow Mr. Tepper to appear and be heard at hearings and on matters in this case, in association with movants, on behalf of CP Management Corp., as management agent for Orland Towne Center, L.L.C.
- 4. Pursuant to Local Rule 9013-1(G) and because there are no novel issues of law presented in this motion, movants request that the requirement that all motions be accompanied by a written memorandum of law be waived.
- 5. Pursuant to Local Rule 9013-1(L) and because this motion does not present contested issues, movants request that the Court rule upon the motion without an oral hearing.
- 6. Notice of this Motion has been given to (a) the Office of the United States Trustee, (b) counsel for the Debtors, and (c) all persons receiving electronic notice via the Court's CM/ECF system.

WHEREFORE, movants respectfully request that the Court enter an Order, substantially in the form attached hereto as **Exhibit A**, permitting Mr. Tepper to appear *pro hac vice*, in association with movants, as counsel for CP Management Corp, as management agent for Orland Towne Center, L.L.C.

DATED: January 26, 2009 Respectfully submitted,

/s/ Jesse N. Silverman

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CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of January, 2009, the foregoing Motion for Admission *Pro Hac Vice* and Proposed Order, were filed and served electronically using the Court's CM/ECF system, and that, in addition, true and correct copies of the foregoing were mailed, First-Class postage prepaid, to the following parties:

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/s/ Jesse N. Silverman
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